

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

V.

CHARLES DAVIDSON,
CHRISTOPHER TIESMAN,
WENDY MUDRA,
HASKELL ROSS,
KENNETH GINES

Case No. 4:10-CR-00201

CHRISTOPHER TIESMAN'S SENTENCING MEMORANDUM

COMES NOW, CHRISTOPHER TIESMAN, by and through his attorneys, and files this Sentencing Memorandum, pursuant to 18 U.S.C. § 3553(a), and would respectfully show this Honorable Court as follows:

I.

CHRISTOPHER TIESMAN has pled guilty to a Class B Misdemeanor. The Sentencing Guidelines do not apply. USSG§ 1B1.9.

II.

Christopher has no prior criminal record or history. He is very involved in the community and is truly an asset to the community. (*See* referenced letters submitted separately)

III.

Christopher was born on May 13, 1968 in Clinton, Iowa to Paula and Brian Tiesman. Chris is the older brother of Nicole Tiesman Grygar. Chris' father's employment caused them to move frequently and during the first 14 years of his life Chris lived in Comanche, Iowa, Lansing, Michigan, Raytown, MO, Grandview, MO, Raymore, MO, and Omaha, NE. In 1982 his family settled in Plano, Texas. Chris attended R.C. Clark High School and Plano East Senior High

School, graduating in 1986. At a young age Chris developed a strong work ethic. At the age of 12 Chris had a paper route and he continued to work throughout his high school years at Winn Dixie, Mervyn's and K-Mart.

In 1986 Chris began his college education at Texas A&M University. He obtained his B.S. in Economics in 1990. That same year he enrolled in the MBA program at Texas A&M and received his MBA in 1992. Chris had to pay for a large portion of his college so while obtaining his undergraduate and graduate degrees; Chris worked various part time jobs. When it became apparent that the part time jobs would not fund his education, Chris sold the sports memorabilia he had collected since the age of 6.

IV.

Chris met Lisa Robertson in 1989. They married in 1994. Chris and Lisa have been extremely fortunate and are the proud parents of three children -- Carter age 13 (6-16-98), Clayton age 11 (11-12-99), and Caleb age 8 (8-4-03). They purchased their first home in Spring, Texas in 1996 and in 1998 moved to Seabrook in conjunction with a work transfer. Carter, Clayton and Caleb attend Trinity Lutheran Elementary and Middle School.

V.

Chris and Lisa attend Faith United Methodist Church and are both actively involved in church activities. Through the church, Chris became very involved in *Kairos*, a program that ministers to prison inmates. This in turn led to Chris volunteering for another group that ministers to post-release prison inmates.

Since 2005 Chris has been heavily involved in the Cub Scouts and Boys Scouts of America. Chris was the den leader for his son's den and maintained that position from the 1st

through 5th grade. Chris has held various positions during his sons' involvement in Scouts. Presently, Chris is the Pack Committee Chairman for Harris County's largest Cub Scout Pack. There are approximately 125 boys in this Pack.

Recently Chris has been volunteering 3 to 4 days a week at Boys & Girls Country in Hockley, Texas. Boys and Girls Club is a privately funded Christian organization for troubled children.

VI.

In 1992, straight out of college, Chris accepted a job with GE Capital and relocated to Houston, Texas. Although his undergraduate degree was in economics, Chris developed an interest in accounting and in his spare time took accounting courses. In 1993, he was offered and accepted a better position with E.M. Bossin & Company. In 1995, Chris left E.M. Bossin & Company to accept a position at Phillips Petroleum in the Audit Department. Chris obtained his CPA license in the early part of 1996. In 1998, Chris moved from Phillips Petroleum to Phillips Chemical Division which lead to moving his family from Spring to Seabrook, Texas. In 1999, Chris joined Palex (predecessor to IFCO) as Director of Planning Analysis and Budget and in August 2001 they returned to Spring, Texas. In 2002, Chris was promoted to VP – Finance & Accounting at IFCO Systems N.A. and in 2006 was promoted to Senior Vice President of Finance and Accounting.

VII.

Mr. Tiesman would respectfully request that this Honorable Court place him on probation and impose a fine, if any, based on the one unauthorized worker to which he pled.

Respectfully submitted,

TRITICO RAINey, PLLC.

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2011, the foregoing document was electronically filed with the Clerk of the District Court using the CM/ECF system, and was served by electronic submission upon all counsel of record.

/S/ Christopher L. Tritico
Christopher L. Tritico